

WISHA REGIONAL DIRECTIVE

WISHA Services

Department of Labor and Industries

29.55

GUARDING OF VEHICLE SERVICE PITS

Date Issued: August 9, 1996

I. Background:

There have been recent inquiries regarding the requirements for guarding vehicle service pits, especially those used in wheel alignment and lubrication activities. This WISHA Regional Directive addresses those questions in relation to the applicable standards.

II. Scope and Application:

This WISHA Regional Directive, which will remain in effect indefinitely, applies whenever WISHA consultation or compliance staff encounter vehicle service pits that may require guarding.

This WRD incorporates the substance of WISHA Interim Operations Memorandum #96-2-I, which is hereby repealed.

III. Interpretative Guidance:

A. Under what circumstances must vehicle service pits be guarded?

The distinguishing characteristic is whether the pit use is so frequent that the necessary presence of the open pit constitutes the regular and continuous nature of the employees' work area.

Pits are specifically addressed in WAC 296-24-75003(5) which includes the following: "Every pit . . ., *infrequently used*, shall be guarded by a floor opening cover of standard strength and construction which should be hinged in place. While the cover is not in place, the pit . . . shall be constantly attended by someone or shall be protected on all exposed sides by removable standard railings [emphasis added]."

In establishments such as quick-lube shops and full-time front-end alignment shops, employee protection is often achieved through a combination of training, signs and pit edge marking. It is the nature of these facilities that the pits are in nearly continuous use and employees are keenly aware of the presence of the pit.

There are, however, numerous situations in which vehicle service pits are used in a less continuous fashion. This is often true in full service garages and fleet maintenance shops. It also occurs when the volume of business does not require constant use of all the pits present (including when the volume that could be handled by a smaller number of pits is spread over a larger number). These pits require the protections described in the code quoted above.

B. What steps to protect employees can be required when guarding is not required?

For those pits which are frequently used and to which WAC 296-24-75003(5) does not apply, the adequacy of edge markings, signs and employee training can be reviewed. If it can legitimately be considered deficient based on accident and injury records, citations may be issued under the appropriate standard(s).

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